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12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 SALVADOR PLASCENCIA, individually; and
15 KYLE HAIL, individually,

16 Plaintiffs,

17 vs.

18 HARTFORD FIRE INSURANCE COMPANY,
19 a Connecticut Corporation; DOES, I through X,
20 inclusive; ROE BUSINESS ENTITIES, I
21 through X, inclusive,

22 Defendants.

Case No.: 2:22-cv-01420-GMN-VCF

**STIPULATION AND ORDER TO
EXTEND DISCOVERY**

(Third Request)

23 Salvador Plascencia and Kyle Hail (**Plaintiffs**), and Defendant, Hartford Fire Insurance
24 Company (**Hartford**), (collectively, the **Parties**), by and through their counsel of record, hereby
25 submit their Stipulation to Extend Discovery Deadlines by sixty-two (62) days in accordance with
26 Local Rule 26-3 and Local Rule IA 6-1.

27 This is the Parties third request for an extension of time to the current discovery plan and
28 counsel submits that the request is brought in good faith, supported by good cause in compliance
with LR 26-3, and is not intended to cause delay.

A. Statement Specifying the Discovery Completed:

The Parties conducted the Fed. R. Civ. P. 26(f) conference on November 3, 2022. On November 16, 2022, the Court entered its initial Discovery Plan and Scheduling Order [ECF No. 15].

To date, the Parties have completed the following discovery:

- Plaintiffs' Initial Disclosures were served on November 30, 2022;
- Hartford's Initial Disclosures were served on December 5, 2022;
- Plaintiffs' First Supplemental Disclosures were served on January 27, 2023;
- Kyle Hail's Interrogatories to Hartford were served on February 8, 2023;
- Salvador Plascencia's Interrogatories to Hartford were served on February 8, 2023;
- Plaintiffs' Requests for Production to Hartford were served on February 8, 2023;
- Hartford's Interrogatories to Salvador Plascencia were served on March 13, 2023;
- Hartford's Interrogatories to Kyle Hail were served on March 13, 2023;
- Hartford's Requests for Production of Documents to Kyle Hail were served on March 13, 2023;
- Hartford's Requests for Production of Documents to Salvador Plascencia were served on March 13, 2023;
- Hartford's Requests for Admissions to Kyle Hail were served on March 13, 2023;
- Hartford's Requests for Admissions to Salvador Plascencia were served on March 13, 2023;
- Hartford's First Supplemental Disclosures were served on April 17, 2023;
- Hartford's Responses to Plaintiffs' Requests for Production were served on April 17, 2023;
- Hartford's Responses to Kyle Hail's Interrogatories were served on April 17, 2023;
- Hartford's Responses to Salvador Plascencia's Interrogatories were served on April 17, 2023;
- Hartford subpoenaed records from Concentra on May 5, 2023;

- Hartford subpoenaed records from Desert Radiology on May 5, 2023;
- Hartford subpoenaed records from Desert Orthopaedic Center on May 5, 2023;
- Kyle Hail's Responses to Hartford's Requests for Production were served on May 10, 2023;
- Salvador Plascencia's Responses to Hartford's Interrogatories were served on May 10, 2023;
- Salvador Plascencia's Responses to Hartford's Requests for Admission were served on May 10, 2023;
- Kyle Hail's Responses to Hartford's Requests for Admission were served on May 10, 2023;
- Kyle Hail's Responses to Hartford's Interrogatories were served on May 10, 2023;
- Salvador Plascencia's Responses to Hartford's Requests for Production were served on May 10, 2023;
- Plaintiffs' Second Supplemental Disclosures were served on May 12, 2023
- Hartford's Second Supplemental Disclosures were served on June 28, 2023;
- Salvador Plascencia's Supplemental Responses to Hartford's Interrogatories were served on June 28, 2023;
- Hartford subpoenaed records from Southern Hills Hospital on June 29, 2023;
- Plaintiffs' Third Supplemental Disclosures were served on June 29, 2023;
- Hartford deposed Salvador Plascencia on June 30, 2023;
- Hartford subpoenaed records from Achieve Physical Therapy on June 30, 2023;
- Hartford's Third Supplemental Disclosures were served on July 12, 2023;
- Hartford deposed Kyle Hail on September 1, 2023; and
- Hartford's Second Requests for Production of Documents to Kyle Hail were served on September 5, 2023.

B. Specific Description of the Discovery that Remains to be Completed:

The Parties need to conduct the following discovery:

- The Parties' Initial Expert Disclosures;

- The Parties' Rebuttal Expert Disclosures;
- Deposition of Fed. R. Civ. P. 30(b)(6) Witness for Hartford;
- Deposition of various fact witnesses and experts; and
- Such other discovery that may be deemed necessary or appropriate.

C. The Reasons why the Deadline was not Satisfied or the Remaining Discovery was not Completed Within the Time Limits set by the Discovery Plan:

The parties have been diligent in conducting discovery since discovery commenced in this matter. However, the Parties have found that more time is needed to coordinate the depositions of Hartford's witnesses, retain experts, and depose said experts. As such, the Parties request a brief sixty day extension.

D. A proposed schedule for completing all remaining discovery.

The Parties request that the current deadlines in the Scheduling Order [ECF No. 15] as amended by later Orders [ECF Nos. 20 and 24] be extended as follows:

1. Last Day to Amend Pleadings or Add Parties: currently July 3, 2023; **closed, no change;**
2. Last Day to Disclose Initial Expert Report: currently November 3, 2023, **desired January 4, 2024;**
3. Last Day to Disclose Rebuttal Experts: currently December 4, 2023, **desired February 5, 2024;**
4. Last Day to Complete Discovery: currently January 2, 2024; **desired March 4, 2024;**
5. Last Day to File Dispositive Motions: currently February 1, 2024, **desired April 3, 2024;**

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6. Last Day to File Joint Pre-Trial Order: currently March 4, 2024, **desired May 3, 2024.**

In the event dispositive motions are filed, the date for filing the joint pretrial order shall be suspended until thirty (30) days after a decision of the dispositive motions.

The disclosures required by FRCP 26(a)(3), and any objections thereto, shall be included in the pretrial order.

IT IS SO STIPULATED.

DATED this 3rd day of October, 2023.

DATED this 3rd day of October, 2023.

PRINCE LAW GROUP

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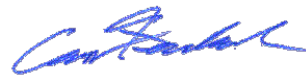
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*Attorneys for Plaintiffs, Kyle Hail
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IT IS SO ORDERED.

Dated this 3rd day of October, 2023.



UNITED STATES MAGISTRATE JUDGE